



California's Future: Is it Time to Revise Title 22?

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Where the Trauma Regulations “live” at the EMS Authority

The EMS Authority has 3 operating divisions

- Personnel
- Disaster Medical Services
- EMS Systems

There are also 2 administrative divisions

- Executive
- Fiscal and Admin



Where the Trauma Regulations “live” at the EMS Authority

EMS Systems Division's responsibilities include oversight to: EMS Planning, EMS Transportation, EMS for Children, Stroke, STEMI, EMS Data, Health Information Exchange, Quality Improvement, Poison Control System, day-to-day field Communications,

And Trauma



Is it time to revise Title 22?

- Statutes and Regulations and their authority
- Development process
- Timeline considerations for regulations revisions



State Policy Considerations

An overview of Statutes, Regulations and Guidelines



California Statues (*The Law*)

Statutes in California:

- Generally laws give basic descriptions of the limitations or requirements of a given subject, topic or issue
- Laws are passed by the legislature and signed by the Governor
- Laws are in place until they are amended, repealed or sunset
- Statutes are enforceable based on their authority



Regulations

Regulations in California:

- Generally regulations give operational detail to the implementation and enforcement of statutes for a given subject, topic or issue
- Regulations are developed and implemented by the State departments who have jurisdiction over their subject matter.
- Regulations are in place until they are amended, repealed or sunset
- Regulations are the operational aspects of laws and are enforceable based on their authority



Why we need both statutes and regulations.....

The statutes provide a general framework from which we operate. Regulations are designed to give more clarity, implementation criteria, etc. for statutes.



Why we need both statutes and regulations.....(con't)

The language in statute is meant to be concise and detailed enough to show intent of the legislation that supported the need for the statute to exist.



Why we need both statutes and regulations.....(con't)

Regulations have more detail in them and use the authority the statute provides for their implementation.



Statutes and regulations.....what are guidelines??

Guidelines are intended to give best practice type information about the implementation, operations, etc. of regulations and statutes.

Guidelines on their own are not enforceable although many statutes do require their development in the operationalization of a statute or regulation.



Regulation Development Process

Regulations can be developed or amended by the department with authority over the regulation's subject matter with justification to the Office of Administrative Law (OAL).

OAL is the state department that is responsible to ensure regulations are developed consistent with State policy.



Regulation Development Process (Con't)

There are two types of regulation processes:

- Emergency rule making
- Regular rule

Regardless of which type of regulations are done by the EMS Authority, our Commission on EMS approves all EMS related regulations in California



Regulation Development Process (Con't)

Emergency rule making is designed for the implementation of regulations when the department has urgent need to have the regulations in place in short order.



Regulation Development Process (Con't)

For emergency rule making to be successful, the department requesting the regulations must meet a high threshold to establish a finding of emergency. Without a confirmed finding of emergency by OAL, the emergency regulations are denied.

The emergency rule making process is approximately 10 business days from start to finish.



Regulation Development Process (Con't)

Regular rule making is the standard rule making process. Most all regulations done by the EMS Authority follow the regular rule making process.

The regular rule making process includes extended public comment period(s), a public hearing, and approval by the Commission on EMS.



Regulation Development Process (Con't)

The regular rule making process can take as little as 90 days to complete but in any case must be completed 365 days from the date of filing of the regulations package with OAL.



Trauma Regulations

Our State Trauma Regulations are officially known as:

California Code of Regulations, Title 22, Division 9, Chapter 7: Trauma Care Systems

AKA: Trauma Regs, Chapter 7, CCR Title 22 Trauma



Trauma Regulations (Con't)

The Trauma Care Systems regulations were approved in.....

A long time ago in a galaxy far, far away!!!

1999



Trauma Regulations (Con't)

The question....

"Why do we need to revise the Trauma Regulations?"



Trauma Regulations (Con't)

Changes in trauma care, the "orange book", general system updates.....

All of these changes since the development of our current regulations gives need to review these regulations for consistency with current practice and operations in place today.



Trauma Regulations (Con't)

At a State Trauma Advisory Committee (STAC) meeting in February 2015, EMS Authority had initial discussions with the STAC about review of the current trauma regulations.



Trauma Regulations (Con't)

The EMS Authority asked STAC to do a preliminary review of the regulations and provide us with items they considered high priority for revision at their next meeting.



Trauma Regulations (Con't)

Once the EMS Authority has the recommendations of STAC, we will convene a general stake holder meeting to consider the current regulations and a revision process.

The general stake holder meeting could take place as early at September 2015.



Process to revise Trauma Regulations

A revision process to Trauma Regulations will be a detailed process.

This process will involve the EMS Authority staff, the STAC and will require the creation of a task force.



Process to revise Trauma Regulations (Con't)

It is difficult to determine with any certainty how long a revision of the Trauma Regulations will take from start to finish.



Process to revise Trauma Regulations (Con't)

A couple main factors will affect the time involved to revise the Trauma Regulations, including:

- Time involved to hold Task Force meetings and review the entire regulation,
- Other regulation packages currently in process in the EMS Systems Division (Stroke, STEMI, EMS for Children, EMS Systems Regulations)



Process to revise Trauma Regulations (Con't)

We would anticipate the Trauma Regulations Task Force to begin meeting in the fall

Membership of that group will be from the stakeholder groups with an interest in the trauma system

Dr. Backer will seek recommendations from our constituent groups for membership to the Task Force later this summer



Best case scenario for completion of this process...

The best case scenario if everything worked through process without issue, we would have new trauma regulations approved by the Commission on EMS in March 2017



Questions??

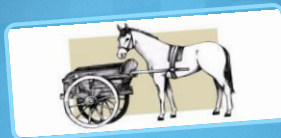
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Data Everywhere: How Best to Utilize It

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CART BEFORE THE HORSE

The presence of data does not
define its use.

CALIFORNIA STATE TRAUMA SYSTEM

PERFORMANCE IMPROVEMENT & PATIENT SAFETY PLAN

Mission

Our mission is to provide an accountable, equitable, and quality state trauma system of care that is driven by evidence based practice and performance improvement reviews which are facilitated by data analysis.



CALIFORNIA STATE TRAUMA SYSTEM

PERFORMANCE IMPROVEMENT & PATIENT SAFETY PLAN

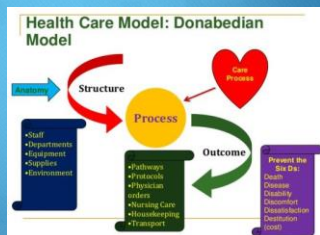
VISION

Through our State Trauma System, all the people of California shall have reduced incidence of injury, the best chance for survival, and maximal potential for recovery.



HEALTH SYSTEM IMPROVEMENT

- Structure
- Process
- Outcome



Structure

- Do we have enough resources to serve our population?
- Do we need a more inclusive system?
- Do we have the right type of resources to serve our population?
- Pediatric resources, disaster resources, air/ground resources
- Do we have trauma resources distributed in the right places to serve our population?
- Are there large gaps in coverage



SILOS

Disconnected Data Sources

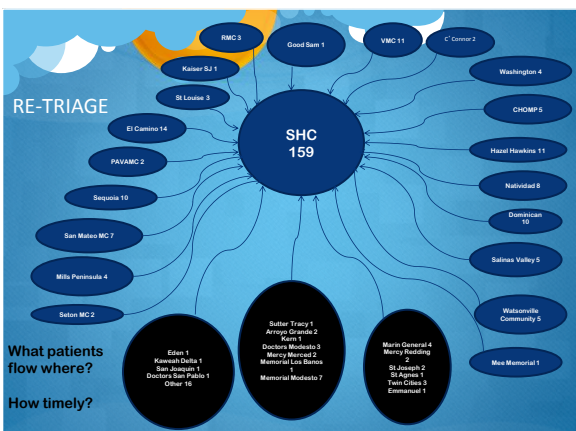


Process

- Re-triage
- Review of How Trauma Centers are designated and quality is measured
- What is warranted vs unwarranted variation in pre-hospital care and how does it impact the system?



RE-TRIAGE

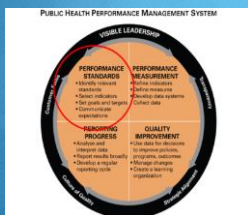


PROCESS

- Warranted vs unwarranted variation
- Population density
- Geographic variability
- Socio-economic considerations



Performance Improvement

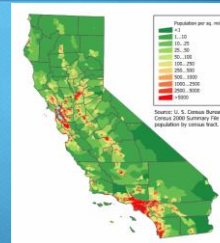


One of several Models

- Donebadian Healthcare Model
- Public Health Performance Management System
- HRSA Model

Outcomes

- TQIP
- Comparative outcomes by
 - Hospital
 - Region
 - Population density
 - Other state subdivisions
- Redefining patient populations to review processes based on other system characteristics



Performance Improvement



All provide strategy and guidance to achieve performance improvement

Choose one, then

- Use the data you have
- Link data from different sources
- Develop new sources

